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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DIAMOND RESORTS U.S. COLLECTION
DEVELOPMENT, LLC, a Delaware limited
liability company,

Plaintiff,
vs.

REED HEIN & ASSOCIATES, LLC d/b/a/
TIMESHARE EXIT TEAM, a Washington
limited liability company; BRANDON REED,
an individual and citizen of the State of
Washington; TREVOR HEIN, an individual
and citizen of Canada; THOMAS
PARENTEAU, an individual and citizen of the
State of Washington; HAPPY HOUR MEDIA
GROUP, LLC, a Washington limited liability
company; MITCHELL R. SUSSMAN &
ASSOCIATES, an individual and citizen of
the State of California; SCHROETER,
GOLDMARK & BENDER, P.S., a
Washington professional services
corporation; and KEN B. PRIVETT, ESQ., a
citizen of the State of Oklahoma,

Defendants.

CASE NO.: 2:17-cv-03007-APG-VCF

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE OPPOSITION
TO PLAINTIFF'S MOTION TO
OVERRULE SCHROETER,
GOLDMARK & BENDER, P.S.'
SPURIOUS PRIVILEGE AND WORK
PRODUCT OBJECTIONS AND
COMPEL DISCOVERY [ECF NO. 278]**

(Second Stipulation)

**STIPULATION AND ORDER TO EXTEND TIME TO FILE RESPONSE TO
PLAINTIFF'S MOTION TO OVERRULE SCHROETER, GOLDMARK & BENDER,
P.S.' SPURIOUS PRIVILEGE AND WORK PRODUCT OBJECTIONS AND
COMPEL DISCOVERY [ECF NO. 278] (Second Stipulation)**

Pursuant to Local Rule 7-1, Plaintiff DIAMOND RESORTS U.S. COLLECTION DEVELOPMENT, LLC ("Plaintiff") and Defendant SCHROETER, GOLDMARK & BENDER, P.S. ("Defendant"), by and through their respective counsel, agree and stipulate as follows:

1. On August 11, 2020, Plaintiff filed Motion to Overrule Schroeter, Goldmark & Bender, P.S.' Spurious Privilege and Work Product Objections and Compel Discovery [ECF No. 278] ("Motion to Compel").

2. On August 25, 2020, a Stipulation and Order to Extend Time to File Response to Plaintiff's Motion to Compel Discovery was entered in this matter. [ECF No. 295].

3. The current deadline for Defendant to file response or opposition to Plaintiff's Motion to Compel Discovery is September 4, 2020.

4. The parties have agreed that Defendant shall be given an extension of one week from the current deadline, or up to and including **Friday, September 11, 2020**, to file its Response to Plaintiff's Motion to Compel.

5. The Parties likewise agree and stipulate to allow Defendant to exceed the page limits under Local Rule 7-3 such that Defendant is allowed an additional five (5) pages to file its Response to Plaintiff's Motion to Compel, if necessary.

6. The Parties likewise agree and stipulate to allow Plaintiff to exceed the page limits under Local Rule 7-3 such that Plaintiff is allowed an additional five (5) pages for any reply brief, if necessary.

7. Pursuant to Local Rule 6-1(b), the Parties state the reason for the extension is that Defendant's counsel requires more time to adequately address and brief its Opposition to the issues presented in Plaintiff's Motion to Compel Discovery. One of the attorneys for SGB also experienced a medical emergency during the week of

1 August 31, 2020, which led to a delay in the preparation of the response.

2 8. The Parties have entered into this agreement in good faith and not for
3 purposes of delay. This is the Parties' second stipulation for extension of this deadline.
4 This request will not cause any prejudice to the parties in this matter.

5 9. Therefore, the parties agree that Defendant's Response to Plaintiff's
6 Motion to Compel Discovery [ECF No. 278] is now due on **September 11, 2020**, that
7 Defendant is allowed to exceed Local Rule 7-4 Page Limit by 5 pages, and that Plaintiff
8 is allowed to exceed Local Rule 7-4 Page Limit by 5 pages in any reply brief, if
9 necessary.

10 Dated this 4th day of September, 2020.

11 GREENSPOON MARDER LLP

12 */s/ Michelle E. Durieux*

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1 Dated this 4th day of September, 2020.

1 LIPSON NEILSON P.C.

1 */s/ Megan H. Hummel*

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1 IT IS SO ORDERED.



1 UNITED STATES MAGISTRATE JUDGE

1 DATED: 9-4-2020